

REC'D
DEC 17 2002

Page 1 of 10
RESP

RCRA Compliance Evaluation Inspection Summary

SAFETY KLEEN, INC.

2549 N. New York
Wichita, Kansas 67219

EPA ID No. : KSD 007 246 846

Inspection Date: June 12 & 13, 2002

KDHE INSPECTORS: Debbie Travis, Steff Fackrell, SCDO, &
Akhter Hossain, Topeka

1.0 INTRODUCTION:

On June 12 & 13, 2002, a routine inspection was conducted at Safety Kleen, Inc. to determine compliance with state hazardous waste regulations and T/S/D status. The inspection covered points of waste generation, waste storage areas, and included a review of related documents and records. This facility was last inspected as both a T/S/D and an EPA Generator of Hazardous Waste on March 9, 2001. We arrived at the facility at approximately 9:10 a.m. and met with Russell J. Dunn, Facility Manager.

2.0 CHANGES SINCE PREVIOUS INSPECTION:

This facility has been a transfer or holding facility since 2001. Hazardous waste material is shipped into the facility and then it is shipped out within one year. The facility is in the process of re certifying their tank farm. The tank farm is expected to become operational in approximately ninety days. Additionally, this facility maybe sold within a couple of months.

For previous violations refer to the attachments for the EPA RCRA CM&E Violations List.

3.0 INSPECTION:

Mr. Russell J. Dunn and John Martin, Routing Supervisor, accompanied us on the inspection of the facility. Refer to the attachment for a facility site map. Safety Kleen has a computer generated logging and numbering system. Every container is labeled with a tracking number. Each year they use a different color. Blue was used in 2001 and Orange is being used in 2002. An example of the numbering system is as follows: (Drum#020515-Sund5-006) The first six numbers are the pickup date of the container. The four letters and a number are a code used for identifying the customer. The last three numbers are the specific number of the drum.

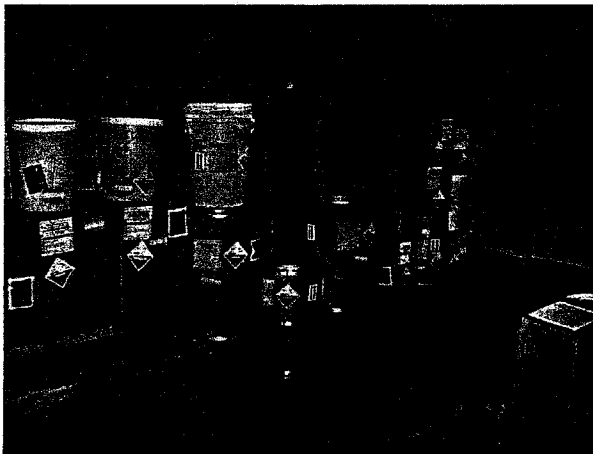


R00406626

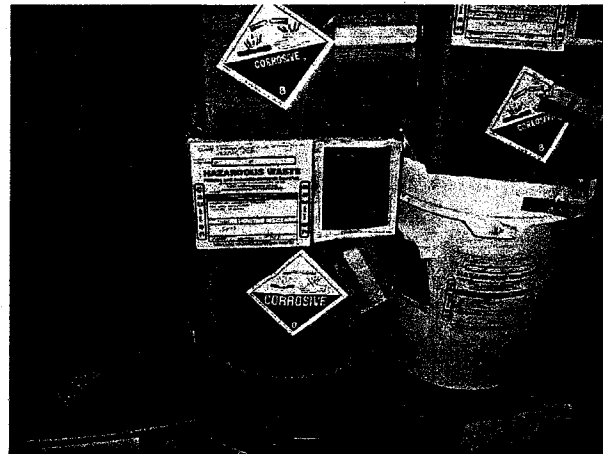
RCRA RECORDS CENTER

3.1 Building J

Building J is divided into seven container management units. The materials managed in these seven units are ignitable, non-ignitable, reactive, non-reactive, and other hazardous waste. We observed water on the floor throughout the building. At one unit location we observed that the bottom of a lab pak box was wet. Refer to photographs # 1 and 2.



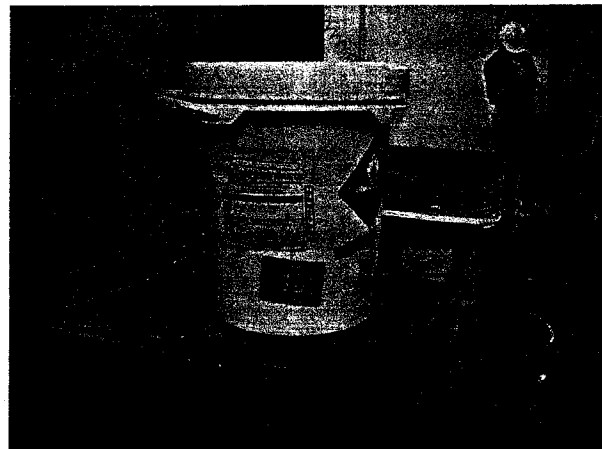
Photograph 1



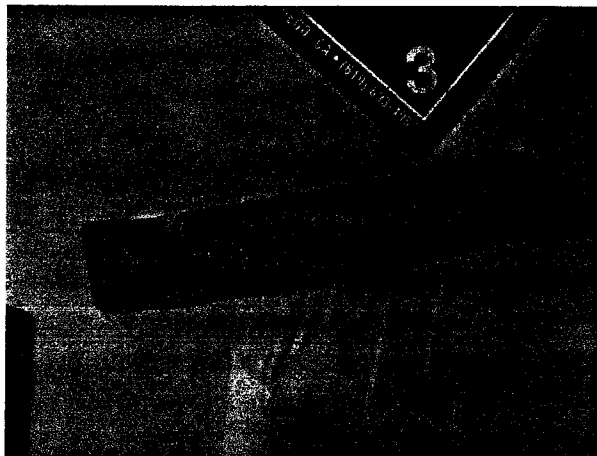
Photograph 2

John Rathgeber, Router, informed us that around 8:30 a.m. he found the top of a drum wet and the lab pak box was sitting on top of the drum. He moved the lab pak to a dry area. He planned on checking the contents of the lab pak later to verify that nothing in the lab pak was leaking. I asked Mr. Dunn when does the facility usually conduct their site inspections. Mr. Dunn stated that the inspections are usually in the afternoon. The roof in building J has been leaking at least since 12/31/00. Refer to the attachments for a weekly inspection log dated 12/31/00. There is a note on the log which states that water was pumped from the north side of the building and water was pumped from the south side of the building. The water problem was identified on multiple inspection logs between March 9, 2001 and June 12, 2002. Violation 6: Permit Condition II.A. was cited for failure to maintain the roof in building J.

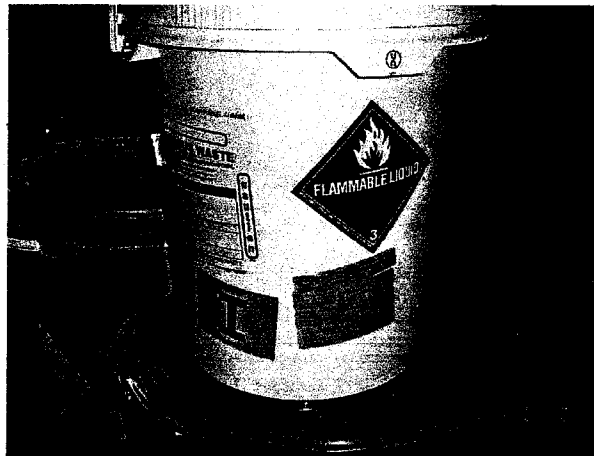
We observed no tracking label with a start accumulation date on a white 5-gallon lab pak (D#020123-PPCC0-517). Refer to photographs # 3 and 4. Violation 4: Permit Condition III.B.1 / K.A.R. 28-31-14 / 40CFR 268.50(a)(2)(i) was cited for no start accumulation date on the 5-gallon lab pak. This violation was corrected on 6/12/02. Refer to photograph # 5.



Photograph 3

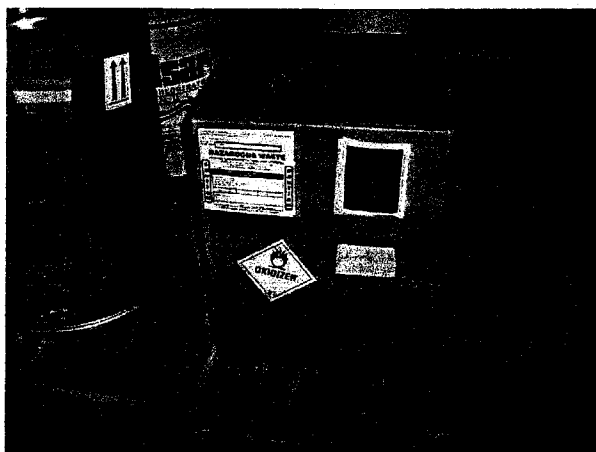


Photograph 4

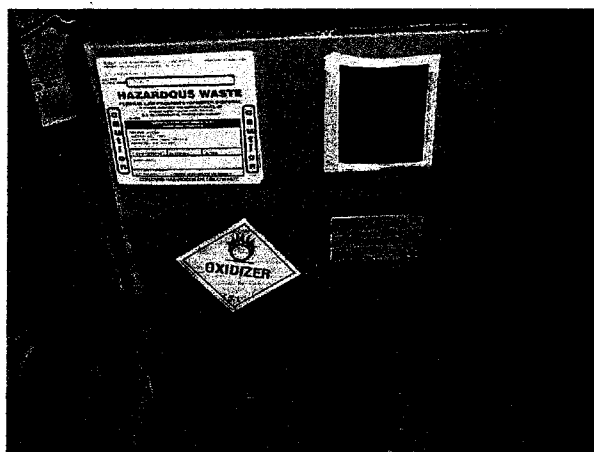


Photograph 5

We observed no tracking label on a cardboard lab pak box (D#020109-HCAW1-506). Refer to photograph # 6. Mr. Martin reviewed the container content sheet to determine what was inside the lab pak. Refer to the attachment for the container content sheet. Violation 4: Permit Condition. III.B.1 / K.A.R. 28-31-14 / 40CFR268.50(a)(2)(i) was cited for no start accumulation date on the lab pak box. This violation was corrected on 6/12/02 refer to photograph # 7.



Photograph 6



Photograph 7

3.2 Building I

Building I is divided into three container management units. The materials managed in these three units are ignitable, non-ignitable, reactive, non-reactive and other hazardous waste. The storage containers were labeled and dated correctly. There was water on the floor throughout the building. The water problem was identified

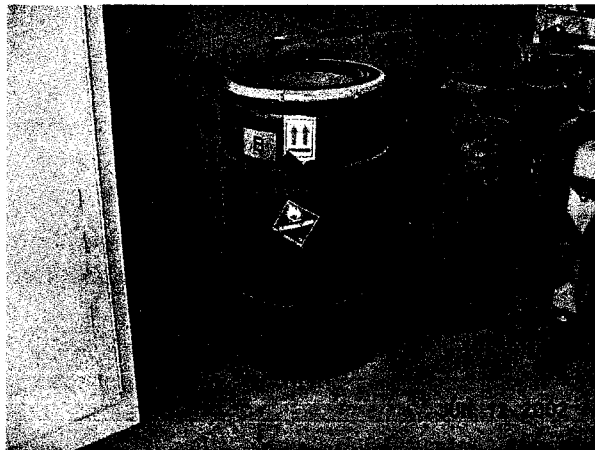
on multiple inspection logs between March 9, 2001 and June 12, 2002. Violation 6: Permit Condition II.A. was cited for failure to maintain the roof in building I.

3.3 Building K

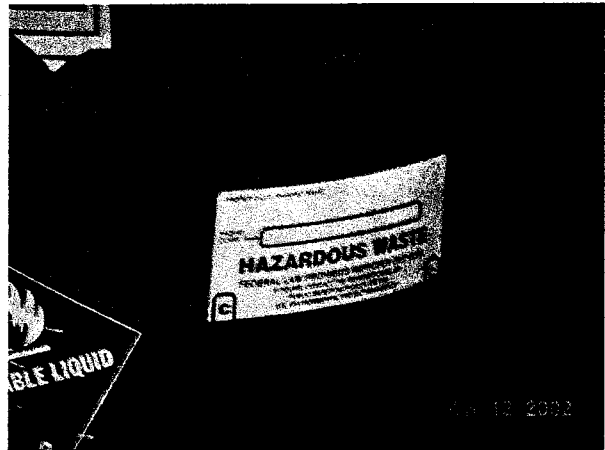
Building K is a non-permitted building. It is used to store office furniture.

3.4 Building B

Building B is divided into four container management units. The materials managed in these four units are corrosive and non-ignitable hazardous waste. We observed a blue 40-gallon satellite drum not marked with the words hazardous waste. Refer to photograph # 8. Violation 2: K.A.R. 28-31-4(j)(1)(B), was cited for the failure to mark a satellite drum with the words hazardous wastes. This violation was corrected on 6/12/02. Refer to photograph # 9. There was water on the floor throughout the building. The water problem was identified on multiple inspection logs between March 9, 2001 and June 12, 2002. Violation 6: Permit Condition II.A. was cited for failure to maintain the roof in building B.



Photograph 8



Photograph 9

3.5 Building C

Building C is divided into seven container management units. The materials managed in these seven units include ignitable and non-ignitable hazardous waste. We observed a bulging lid on a black 55-gallon drum (D#020523-CATAL-001). The drum contains hazardous paint solvent. Refer to the attachments for the Material Profile on this waste. Refer to photographs # 10 and 11. Violation 3: Permit Condition III.C / 40CFR264.171 was cited for one storage drum not in good condition. This violation was corrected on 6/12/02. Refer to photograph # 12. The black drum was over packed into a yellow drum.



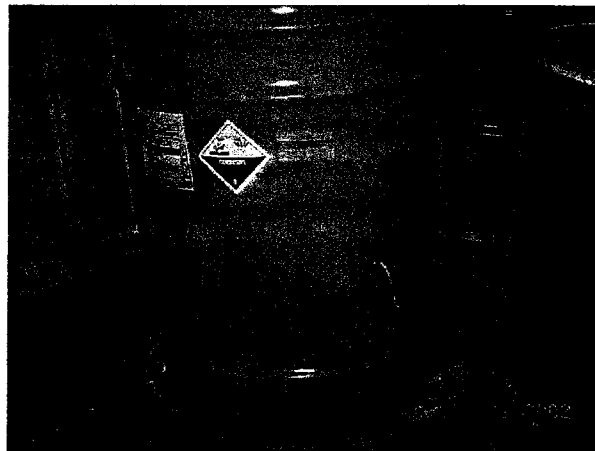
Photograph 10



Photograph 11

3.6 Building D

Building D is divided into three container management units. The materials managed in these three units are ignitable and/or non-ignitable or a combination of both materials. Building D additionally stores fluorescent lamps, empty drums and maintenance equipment. Additionally, there are eleven horizontal tanks mounted in the ceiling. The tanks are not currently in use. The containers were labeled and dated correctly. We observed two to three inches of water in one area of this building. The roof in building D has been leaking at least since 1/1/01. Refer to the attachments for a weekly inspection log dated 1/1/01. There is a note on the log which states the roof leaks on shop. The water problem was identified on multiple inspection logs between March 9, 2001 and June 12, 2002. Violation 6: Permit Condition II.A. was cited for failure to maintain the roof in building D.



Photograph 12

3.7 Tank Farm

The tank farm has nine tanks not currently in use. The facility is in the process of re-certifying the tanks. The tanks will be operational in approximately 90 days. The tank farm is inspected daily. There is a small amount of waste being stored in this area. The containers were labeled and dated correctly.

3.8 Laboratory

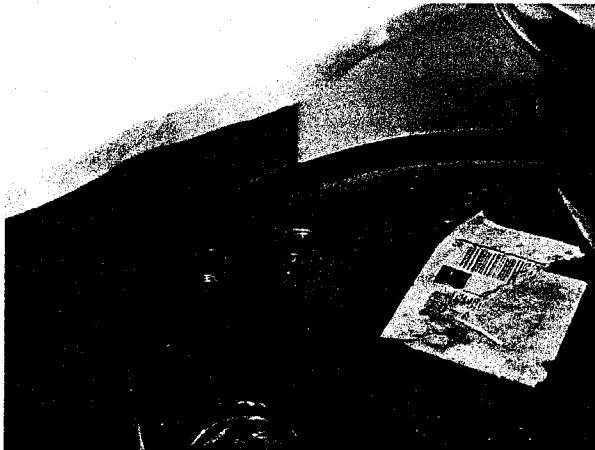
Heather Metzger, lab tech, conducts chemical analysis on samples taken from

each waste material shipped to this site. We observed one 500-ml day container inside the fume hood and one 5-gallon day step can container in the lab. These containers are emptied daily into the satellite drums in the processing area. We observed one open black 30-gallon satellite drum containing hazardous liquid lab waste. Refer to photographs # 13 and 14. Violation 1: K.A.R. 28-31-4(j)(1)(A), was cited for an open satellite drum of hazardous waste. This violation was corrected on 6/12/02. Refer to photograph # 15.

3.9 Processing Area



Photograph 13



Photograph 14



Photograph 15

The processing area is divided into two container management units. The materials managed in both units are liquid and solid hazardous waste. The processing area is where containers are logged into the facility's computer and labels are generated. Laboratory sampling is conducted in this area. We observed one open black 55-gallon satellite drum containing personal protective equipment (PPE). Refer to photographs # 16 and 17. Violation 1: K.A.R. 28-31-4(j)(1)(A), was cited for one open satellite drum of hazardous PPE waste. This violation was corrected on 6/12/02.



Photograph 16

We observed two black 55-gallon satellite drums containing PPE waste. The date marked on the drums was 5/1/02. This was the date that the facility started filling the drums. Refer to photographs # 17 through 19. Violation 5: K.A.R. 28-31-4(j)(2) was cited for an improper start accumulation date on two 55-gallon satellite drums. This violation was corrected on 6/12/02. Refer to photographs # 20 and 21.



Photograph 17



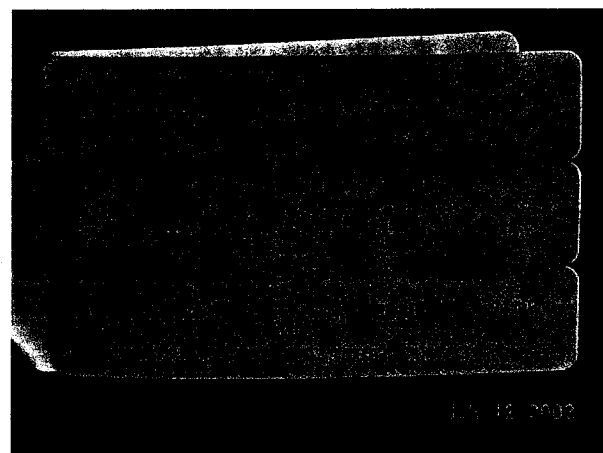
Photograph 18



Photograph 19



Photograph 20



Photograph 21

4.0 Record Review:

We reviewed the 2001 biennial report, contingency plan, personnel training documents, manifests, LDR's, and inspection logs from March 9, 2001 through June 13, 2002.

Violation 7: 40CFR 264.15(d) / Permit Condition II.E. was cited for 138 violations on the daily and weekly inspection logs. Refer to the attachments for the spreadsheet labeled Safety-Kleen Inspection Log Violations and copies of all of the inspection logs. We observed 40 inspection logs with missing work orders. A problem would be identified on an inspection log and a work order number was listed. When we asked Mr. Dunn to retrieve the work order he could not always find the work order. We do not know if the corrective action was completed. We only cited a violation for each work order number even though sometimes there were multiple problems cited on one work order. We observed 71 inspection logs with no corrective action noted. A problem would be identified on the inspection log but there was no evidence that the problem had been corrected. We observed 22 inspection logs missing the time of the inspection. We observed 6 inspection logs missing the full name of the inspector.

Violation 8: 40CFR 264.73(a)(5) / Permit Condition I.I.2.e, was cited for the failure to provide 61 daily inspection logs from May 1 through June 30, 2001. Ron Robertson, previous facility manager, had stored the inspection log records and the facility could not find them. I informed Mr. Dunn that they had until Monday, June, 17, 2002 to find the inspection logs. Mr. Dunn telephoned me on 6/17/02. He informed me that they could not find the inspection logs for May and June 2001. Refer to the attachments for the telephone conversation record dated 6/17/02.

Violation 9: K.A.R. 28-31-4(q) / 40CFR262, subpart E, was cited for the failure to file a notice with the Secretary of KDHE for the exporting of hazardous waste to a foreign country five different times, 3/14/01, 8/2/01, 11/8/01, 1/19/02, and 2/12/02. The facility did report the exports to the EPA. Refer to the attachment for the Safety Kleen annual EPA export reports dated April 19, 2001 and April 23, 2002. Additionally, refer to the fax dated 6/17/02 from Mr. Dunn, which lists all the shipments sent to Canada since March 2001.

5.0 Exit Interview:

After completing the walk through inspection, and reviewing the facility's paperwork, we conducted an exit interview with Mr. Dunn, Mr. Martin, and Mr. Robertson. We explained the violations and the corrective actions. Our additional comments were on employee training. Although no violations were cited concerning employee training, it was stated that many of the violations cited during this inspection could have been minimized if the employees had additional training. I left a Hazardous

Waste Generator Handbook with Mr. Dunn.

6.0 SUMMARY OF WASTE STREAMS:

PPE

Floor Debris

Damaged Containers

Spill Cleanup Material

7.0 SUMMARY OF VIOLATIONS:

Violation 1: K.A.R. 28-31-4(j)(1)(A), two open satellite drums of hazardous waste.

Violation 2: K.A.R. 28-31-4(j)(1)(B), failure to mark a satellite drum with the words hazardous waste.

Violation 3: 40CFR 264.171 / Permit Condition III.C, one 55-gallon storage drum not in good condition.

Violation 4: Permit Condition III.B.1 / K.A.R. 28-31-14 / 40CFR268.50(a)(2)(i), no start accumulation date on the two lab pak storage containers.

Violation 5: K.A.R. 28-31-4(j)(2), improper start accumulation date on two 55-gallon satellite drums.

Violation 6: 40CFR 264.31 / Permit Condition II.A., failure to maintain the roof in building B, J, I, & D.

Violation 7: 40CFR 264.15(d) / Permit Condition I.I.E, 138 violations on the daily and weekly inspection logs.

Violation 8: 40CFR264.73(a)(5) / Permit Condition I.I.2.e., failure to provide 61 daily inspection logs from May 1 through June 30, 2001.

Violation 9: K.A.R. 28-31-4(q) / 40CFR262, failure to file a notice with the Secretary of KDHE for the exporting of hazardous waste to a foreign source five different times, 3/14/01, 8/2/01, 11/8/01, 1/19/02, and 2/12/02.

8.0 ATTACHMENTS:

EPA RCRA CM&E Violation List for KSD 007 246 846
Facility Site Map
Material Profile for the Solvent Paint
Container Content Sheet for Drum#020109-HCAW1-506
Telephone Conversation Record dated 6/17/02
Annual Export EPA Report dated April 19, 2001
Annual Export EPA Report dated April 23, 2002
Fax dated 6/16/02 from Mr. Dunn listing the export shipment dates since March 2001
Inspection Log Violation Spread Sheet
Daily and Weekly Inspection Logs

9.0 APPENDIX

Photographs 1 through 21. The photographs were taken with a Sony Mavica digital camera by Debbie Travis or Steff Fackrell.